

### **REMARKS**

The Office Action dated January 17, 2007 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

In accordance with the foregoing, claims 1-8, 10-20, and 22-23 have been amended to improve clarity of the features recited therein and claims 9 and 21 have been cancelled, without prejudice or disclaimer. Claims 24 and 25 have been added corresponding to independent claims 12 and 13, respectively, and including means-plus-function terminology. No new matter is being presented, and approval and entry are respectfully requested.

Claims 1-8, 10-20, and 22-25 are pending and under consideration.

### **REJECTION UNDER 35 U.S.C. § 102:**

*On page 2 of the Office Action, claims 1-23 rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,556,820 to Le et al. ("Le"). The Office Action took the position that Le describes all the recitations of independent claims 1, 12, and 13 and related dependent claims. It is respectfully asserted that, for at least the reasons provided herein below, Le fails to teach or suggest the recitations of the pending claims. Reconsideration is requested.*

Independent claim 1, upon which claims 2-8 and 10-11 are dependent, recites a method in a communication system wherein a subscription is associated with a plurality of public and private identities, the method including storing in a user information storage information relations between the plurality of public and private identities and of a control entity in which at least one of the identities is registered, allocating the control entity to a further registration based on the information stored in the user information storage, and recognizing at the user information storage that different private identities associate with a common service profile.

Independent claim 12 recites a communication system, including a plurality of control entities, a user information storage configured to store information of relations between public and private identities associated with users of a communication system and of a control entity in which at least one of the public and private identities is registered, an allocating unit configured to allocate a call control entity to a further registration associated with a user based on the information stored in the user information storage, and a recognizing unit configured to recognize at the user information storage that different private identities associate with a common service profile.

Independent claim 13, upon which claims 14-20 and 22 are dependent, recites a user information storage entity for a communication system, the user information storage entity including a storing unit configured to store information of relations between public and private identities associated with users of a communication system and of a control entity in which at least one of the public and private identities is registered, an allocating

unit configured to allocate the call control entity to a further registration associated with a user based on the information stored in the user information storage, and a recognizing unit configured to recognize at the user information storage that different private identities associate with a common service profile.

Independent claim 24 recites a communication system, including a plurality of control entities, user information storage means for storing information of relations between public and private identities associated with users of a communication system and of a control entity in which at least one of the public and private identities is registered, and allocating means for allocating a call control entity to a further registration associated with a user based on the information stored in the user information storage means, and a recognizing unit configured to recognize at the user information storage that different private identities associate with a common service profile.

Independent claim 25 recites a user information storage entity for a communication system, the user information storage entity including storing means for storing information of relations between public and private identities associated with users of a communication system and of a control entity in which at least one of the public and private identities is registered, allocating means for allocating the call control entity to a further registration associated with a user based on the information stored in the user information storage, and a recognizing unit configured to recognize at the user information storage that different private identities associate with a common service profile.

As will be discussed below, Le fails to disclose or suggest the elements of any of the presently pending claims.

Le generally describes a scheme for providing mobility management for a mobile phone. The mobility management scheme has the flexibility to support multiple subscriptions in a single mobile terminal. A subscription is defined by a set of services and a subscriber identity, and each subscription can correspond to a different service provider. A UMTS subscriber identity module (USIM) is allocated for each subscription associated with a mobile terminal. A location area update is performed by providing a single location area update request message including a list of USIMs such that location area update requests do not need to be sent for each USIM/subscription.

The Office Action contends that Le discloses a subscription associated with a plurality of private identities. However, Le discloses that each subscription is associated with a different private entity (USIM). See column 4, line 50, to column 6, line 8.

Furthermore, the Office Action contends that Le discloses recognizing “at the user information storage that different private identities associate with a common service profile,” as recited in independent claims 1, 12, 13, 24, and 25. However, Applicants respectfully traverse such contention. Le actually discloses that different private entities associate with different subscriptions and a subscription is defined by a set of services which can correspond to a different service provider (See, for example, column 4, lines 54 to 59). Thus, while Le may disclose that different private identities associate with common identification data of a user, Le further discloses that the different private

identities associates with different service profiles. Contrary to the contentions made in the Office Action, there is no teaching or suggestion in Le of recognizing at the user information storage that different private identities associated with a common service profile.

One of the many advantages of recognizing at the user information storage that different private identities associate with a common service profile as recited in the present claims may be understood by considering an embodiment of the present invention as follows. An organization may subscribe to a communication system and be allocated a public identity such as a telephone number which is associated with the subscription. A number of individuals within the organization may have private identities. It may be that the organization allocates different service profiles for different private entities. For example, it may be that within the organization, different divisions may have different service profiles. The present application recognizes that this is a common arrangement for many organizations and that the communication system is best configured to deal with this type of organization by providing a method comprising recognizing at the user information storage that different private identities associate with a common service profile. Control entities can then be allocated utilizing this recognition. This mechanism allows registration of all private identities utilizing the same services to take place at the same controller entity. The proposed mechanism may ensure that all private identifies associated with the same service profile are registered to the same S-CSCF. Registration at the same S-CSCF enables provision of the same services for a number of subscribers

which have the same service profile. Support for this mechanism is described, for example, at page 9, lines 21 to 25, page 10, lines 8 to 11, and the last paragraph of page 11 of the specification of the present application. Another example would be a family which has a common public identity. The parents in the family may have private identities associated with one service profile, whereas the children may have private identities associated with a different, restricted service profile.

With the aforementioned organizational structures, Le cannot group private identities according to their associated service profile and allocate a control entity to private identities having a common service profile. Rather, Le only associates different private identities with different subscriptions (and, thus, different service profiles) of a single user terminal. As such, the arrangement described in Le is not adapted for use in organizations which have sub-divisions comprising groups of private identities having common service profiles.

The problem to be solved in Le is that of providing a method in a communication system which is better adapted for organizations to utilize, in which private identities having a common service profile can be allocated to a common control entity which is suitable for accommodating common service profiles. The aforementioned problem and its associated solution is neither disclosed nor suggested in Le. Le fails to disclose or suggest all of the elements of any of the presently pending claims, and, thus, fails to provide the critical and non-obvious advantages described above.

Accordingly, in view of the foregoing, it is respectfully asserted that Le fails to teach or suggest all the recitations of independent claims 1, 12, 13, 24, and 25 and related dependent claims. It is respectfully requested that the present claims be allowed.

**CONCLUSION:**

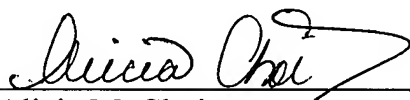
In view of the above, Applicants respectfully submit that the claimed invention recites subject matter which is neither disclosed nor suggested in the cited prior art. Applicants further submit that the subject matter is more than sufficient to render the claimed invention unobvious to a person of skill in the art. Applicants therefore respectfully request that each of claims 1-8, 10-20, and 22-25 be found allowable and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the Applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the Applicants respectfully petition for an appropriate extension of time.

Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

  
Alicia M. Choi  
Registration No. 46,621

**Customer No. 32294**  
SQUIRE, SANDERS & DEMPSEY LLP  
14<sup>TH</sup> Floor  
8000 Towers Crescent Drive  
Tysons Corner, Virginia 22182-2700  
Telephone: 703-720-7800  
Fax: 703-720-7802

AMC:cmc

Enclosures: Additional Claim Fee Transmittal; Petition for Extension of Time; Check  
No. 16372